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34 MAUMOYNIER and MATTHEW TURNER

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

ANTHONY BALBIANI, an individual,

Plaintiff,

V.

CHESTER PUBLIC UTILITY DISTRICT, INC.,
a local government entity;
MATTHEW MAUMOYNIER, an individual;
MATTHEW TURNER, an individual; BRIAN
LAYNE, an individual; and
DOES 1 –through 20, inclusive.

Defendants.

Case No.: 2:20-CV-02310-TLN-DMC

**JOINT STIPULATION AND ORDER TO
EXTEND DISCOVERY AND LAW AND
MOTION DEADLINES; ORDER**

Complaint Filed: November 19, 2020
Trial Date: None

Plaintiff Anthony Balbiani (“Plaintiff”), and Defendants Chester Public Utility District, Inc., Matthew Maumoynier, and Matthew Turner (collectively referred to as “Defendants”), by and through their attorneys hereby stipulate and seek Court approval for the following:

WHEREAS, on February 18, 2022, the Parties stipulated to, and the Court granted their request to extend discovery and law and motion deadline, which provides a deadline of October 7, 2022, for non-expert discovery;

WHEREAS, the parties have continued to meet and confer on written discovery requests and responses, and the scheduling of depositions;

WHEREAS, counsel for Defendant Chester Public Utility District, Inc. will be mostly unavailable for the month of May:

WHEREAS, Plaintiff have approximately 7 to 8 more witnesses to depose;

WHEREAS, the Parties have not completed written discovery or depositions, and considering the foregoing, a non-expert discovery deadline of October 7, 2022, will not provide the Parties sufficient time to complete fact discovery before the cut-off;

WHEREAS, the Parties have agreed to extend the discovery cut-off deadline; and

WHEREAS, a trial date has not been set;

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1 **STIPULATION**

2 THEREFORE, it is hereby stipulated and agreed by the parties, as follows:

3 1. The deadline for non-expert discovery shall be extended to October 7, 2022;

4 2. Expert disclosures shall be made by December 6, 2022 (60 days after close of

5 discovery);

6 3. Dispositive motion shall be filed no later than April 5, 2023 (180 days after close of

7 discovery); and

8 4. Joint Notice of Trial Readiness shall be filed by February 3, 2023 (120 days after close

9 of discovery).

10 IT IS HEREBY STIPULATED

11 Date: May 16, 2022

LAW OFFICES OF TANYA GOMERMAN

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13 By: _____/s/ _____

14 Maria A. Bourn, Esq.

15 Attorney for PLAINTIFF

16 ANTHONY BALBIANI

17 Date: May 16, 2022

18 ALLEN, GLAESNER, HAZELWOOD
19 AND WERTH, LLP

20 By: _____/s/ _____

21 Peter Glaessner, Esq.

22 Kellen Crowe, Esq.

23 Attorney for DEFENDANTS CHESTER

24 PUBLIC UTILITY DISTRICT and

25 BRIAN LAYNE

26 Date: May 16, 2022

27 MAIRE & DEEDON

28 By: _____/s/ _____

29 Patrick Deedon, Esq.

30 Attorney for DEFENDANTS MATTHEW

31 MAUMOYNIER and MATTHEW TURNER

ORDER

The stipulation is approved.

This Court has reviewed and considered the above stipulation among the Parties. For good cause shown, it is hereby ordered as follows:

1. The deadline for non-expert discovery shall be extended to October 7, 2022;
2. Expert disclosures shall be made by December 6, 2022 (60 days after close of discovery);
3. Dispositive motion shall be filed by April 5, 2023 (180 days after close of discovery);

and

4. Joint Notice of Trial Readiness shall be filed by February 3, 2023 (120 days after close of discovery).

IT IS SO ORDERED.

Dated: May 18, 2022

John L. Noland

Troy L. Nunley
United States District Judge